

**To:** Rumrill, Nancy[Rumrill.Nancy@epa.gov]  
**From:** JAMES D WALKER  
**Sent:** Thur 1/19/2017 2:23:14 AM  
**Subject:** RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

.....  
>>>>>>>>

Hi Nancy,

## Ex. 4 - CBI

Thanks,

Jim

**From:** Rumrill, Nancy  
**Sent:** Wednesday, January 18, 2017 5:12 PM  
**To:** [Jonathan.Koplos@cadmusgroup.com](mailto:Jonathan.Koplos@cadmusgroup.com); JAMES D WALKER  
**Cc:** Rao, Kate; Maryam Akhavan; Albright, David  
**Subject:** RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Call for Friday will only be with EPA to prepare for meeting with Excelsior on the 1/24. Thanks,  
Nancy



United States Environmental Protection Agency

Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))

Drinking Water Protection Section (WTR-3-2)

US EPA, Region IX

75 Hawthorne St.

San Francisco, CA 94105

Phone (415) 972-3293

**From:** Rao, Kate  
**Sent:** Wednesday, January 18, 2017 3:56 PM

**To:** Jonathan.Koplos@cadmusgroup.com; Rumrill, Nancy  
**Cc:** JAMES D WALKER ; Maryam Akhavan ; Albright, David  
**Subject:** RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Jim/Jonathan:

# Ex. 4 - CBI

Many thanks. Kate

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Kate Rao  
Drinking Water Protection Section (WTR 3-2)  
USEPA Region 9  
75 Hawthorne St., San Francisco, CA 94105  
tel: (415) 972-3533 / fax: (415) 947-3549

**From:** Jonathan Koplos [<mailto:Jonathan.Koplos@cadmusgroup.com>]  
**Sent:** Wednesday, January 18, 2017 11:49 AM  
**To:** Rao, Kate <[Rao.kate@epa.gov](mailto:Rao.kate@epa.gov)>; Rumrill, Nancy <[Rumrill.Nancy@epa.gov](mailto:Rumrill.Nancy@epa.gov)>; Greenberg, Leslie <[Greenberg.Leslie@epa.gov](mailto:Greenberg.Leslie@epa.gov)>  
**Cc:** JAMES D WALKER <[jameswalker5@msn.com](mailto:jameswalker5@msn.com)>; Maryam Akhavan <[Maryam.Akhavan@cadmusgroup.com](mailto:Maryam.Akhavan@cadmusgroup.com)>  
**Subject:** RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Kate and Nancy,

Please find attached the Cadmus comments document based on our technical review of the Excelsior December 2016 response to the EPA October 2016 Request for Information.

Please let us know if you have any questions. I believe a follow-up call between you and Jim is planned for Friday, January 20. (Has a time been set for that call yet?)

Thank you,

Jonathan

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Jonathan Koplos, Ph.D.

The Cadmus Group, Inc.

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Waltham, MA 02451

Ph. 617-673-7184

Cell 617-775-5789

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**From:** Jonathan Koplos

**Sent:** Wednesday, January 11, 2017 4:46 PM

**To:** 'Greenberg, Leslie' <[Greenberg.Leslie@epa.gov](mailto:Greenberg.Leslie@epa.gov)>; Rumrill, Nancy  
<[Rumrill.Nancy@epa.gov](mailto:Rumrill.Nancy@epa.gov)>; Rao, Kate <[Rao.kate@epa.gov](mailto:Rao.kate@epa.gov)>

**Cc:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; JAMES D WALKER  
<[jameswalker5@msn.com](mailto:jameswalker5@msn.com)>

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Thank you for the quick response, Leslie.

We'll keep moving on it!

Jonathan

**From:** Greenberg, Leslie [<mailto:Greenberg.Leslie@epa.gov>]

**Sent:** Wednesday, January 11, 2017 4:45 PM

**To:** Jonathan Koplos <[Jonathan.Koplos@cadmusgroup.com](mailto:Jonathan.Koplos@cadmusgroup.com)>; Rumrill, Nancy  
<[Rumrill.Nancy@epa.gov](mailto:Rumrill.Nancy@epa.gov)>; Rao, Kate <[Rao.kate@epa.gov](mailto:Rao.kate@epa.gov)>

**Cc:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; JAMES D WALKER  
<[jameswalker5@msn.com](mailto:jameswalker5@msn.com)>

**Subject:** RE: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Johnathan,

The revised LOE estimates and deliverable dates for the Excelsior response review are acceptable.

Thanks,

Leslie

## **Leslie Ann Greenberg**

Leslie Ann Greenberg

U.S. EPA, Region 9

Drinking Water Protection Section (WTR-3-2)

Tribal and State Assistance Branch

75 Hawthorne Street, San Francisco, CA 94105

tel. 415 972 3349 FAX 415 947 3549

[Greenberg.leslie@epa.gov](mailto:Greenberg.leslie@epa.gov)

**From:** Jonathan Koplos [<mailto:Jonathan.Koplos@cadmusgroup.com>]

**Sent:** Wednesday, January 11, 2017 1:11 PM

**To:** Rumrill, Nancy <[Rumrill.Nancy@epa.gov](mailto:Rumrill.Nancy@epa.gov)>; Greenberg, Leslie <[Greenberg.Leslie@epa.gov](mailto:Greenberg.Leslie@epa.gov)>; Rao, Kate <[Rao.kate@epa.gov](mailto:Rao.kate@epa.gov)>

**Cc:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; JAMES D WALKER <[jameswalker5@msn.com](mailto:jameswalker5@msn.com)>

**Subject:** FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Nancy and Leslie (and David and Kate),

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# Ex. 4 - CBI

Please let us know if the revised LOE and due date is acceptable, and/or if you have any questions.

Thank you,

Jonathan

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Jonathan Koplos, Ph.D.

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Waltham, MA 02451

Ph. 617-673-7184

Cell 617-775-5789

[www.cadmusgroup.com](http://www.cadmusgroup.com)

**From:** Rao, Kate [<mailto:Rao.kate@epa.gov>]

**Sent:** Friday, December 16, 2016 1:39 PM

**To:** JAMES D WALKER <[jameswalker5@msn.com](mailto:jameswalker5@msn.com)>; Jonathan Koplos  
<[Jonathan.Koplos@cadmusgroup.com](mailto:Jonathan.Koplos@cadmusgroup.com)>

**Cc:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Rumrill, Nancy <[Rumrill.Nancy@epa.gov](mailto:Rumrill.Nancy@epa.gov)>

**Subject:** FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Jonathan/Jim --

We just received a response from Excelsior addressing our Oct 2016 Notice Of Deficiency letter (see attached). Therefore, we need assistance under Task 4 for technical review (see below email thread for initial TDM).

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WACOR.

o Material: Excelsior NOD response and Excelsior ADEQ APP supplemental permit application.

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# Ex. 4 - CBI

mp Call with Excelsior: Tentatively 1/24/2017 [Nancy will coordinate directly with Jim on call logistics.]

I plan to mail the material directly to Jim today. In addition to the NOD response, I will include a copy Excelsior's ADEQ APP supplemental permit application. There is info/material in the supplemental application that might be useful for your review of the NOD response.

Please let me know if you have any questions.

Kate

\*\*\*\*\*

Kate Rao  
Drinking Water Protection Section (WTR 3-2)  
USEPA Region 9  
75 Hawthorne St., San Francisco, CA 94105  
tel: (415) 972-3533 / fax: (415) 947-3549

**From:** Rao, Kate

**Sent:** Wednesday, November 02, 2016 10:19 AM

**To:** [Jonathan.Koplos@cadmusgroup.com](mailto:Jonathan.Koplos@cadmusgroup.com)

**Cc:** JAMES D WALKER <[jameswalker5@msn.com](mailto:jameswalker5@msn.com)>; Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Rumrill, Nancy <[Rumrill.Nancy@epa.gov](mailto:Rumrill.Nancy@epa.gov)>

**Subject:** Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Jonathan – below is a new work initiation request under Contract No. EP-C-15-022, WA 1-90 for Excelsior. Please let me know if you have any questions. You have already confirmed that Jim will work on this project so I am cc'ing him on this email.

Nancy is the tech lead on this project and she will cc: you and me on all call logistics and tech review

items.

See Task 5, section a. for info on upcoming call. I am still working out the logistics and will update you when I get more information.

Thanks. Kate

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**Contract No. EP-C-15-022, Workplan Assignment No. 1-90**

**R9 Tech Support for Implementation of the UIC Program – Excelsior Mining Company -  
Class III UIC Permit #R9UIC-AZ1-FY-16-1**

**Task 4 (Project Technical Reviews) & Task 5 (Consultation)**

**Technical Direction**

**Background:** Excelsior Mining Company (Excelsior) has submitted a UIC area permit application to operate a Class III ISR copper mining facility in Chochise County, AZ.

On 3/24/2016, we issued a TDM requesting a technical review of Excelsior's Class III permit application. Cadmus submitted technical review comments on 6/8/2016 (see attached: Comments on the Excelsior Mining Arizona Gunnison Copper Project\_6-8-2016.docx). EPA utilized these comments to issue the attached Notice of Deficiency on 10/14/2016 to Excelsior. Excelsior has requested a conference call with EPA Region 9 to discuss the NOD.

**Under Task 5 (Consultation),** the contractor shall make available a staff person to consult,

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Under Task 4 (Project Technical Review), the contractor shall provide technical review for

**Ex. 4 - CBI**

d.

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